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and

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Attorneys for Defendants, Walmart Inc. and Jetson Electric Bikes, LLC

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH)	
Individually and as Parent and Legal Guardian)	Case No. 2:23-cv-00118-NDF
of W.W., K.W., G.W., and L.W., minor children)	
and MATTHEW WADSWORTH,)	DECLARATION OF
)	JARED B. GIROUX
Plaintiffs,)	IN SUPPORT OF MOTION TO
)	EXCLUDE TESTIMONY OF
v.)	RONALD SNYDER
)	
WALMART INC. and)	
JETSON ELECTRIC BIKES, LLC,)	
)	
Defendants.)	

I, Jared G. Giroux, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Falmouth, Maine.

2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and

Walmart Inc., admitted pro hac vice on September 6, 2023.

3. This case involves a February 1, 2022 residential fire in Green River, Wyoming.

4. My partner, Eugene LaFlamme, attended the deposition of Dr. Ronald Snyder,

taken on August 14, 2024.

5. Attached as Exhibit 1 are the pertinent portions of Plaintiffs' Initial Expert Witness

Disclosures – Dr. Snyder's Report filed on July 15, 2024, Doc. 73-2.

6. Attached as Exhibit 2 are the pertinent portions of Dr. Ronald Snyder's deposition

taken on August 14, 2024.

7. Attached as Exhibit 3 are the pertinent portions of Dr. Callie Thompson's

deposition taken on October 15, 2024.

8. Attached as Exhibit 4 are the pertinent portions of Dr. Scott Sulentich's deposition

taken on August 27, 2024.

9. Attached as Exhibit 5 are the pertinent portions of Plaintiff Stephanie Wadsworth's

deposition taken on February 27, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 2, 2024

Jared B. Giroux